

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

ROCKDALE COUNTY,

*Plaintiff,*

*v.*

BIO-LAB INC., *et al.*,

*Defendants.*

C. A. No. 1:24-cv-04916-SEG

JURY TRIAL DEMANDED

**NOTICE OF FILING PROPOSED SCHEDULING ORDER**

Pursuant to this Court's Order of February 5, 2025 [Doc. 41], Plaintiff and Defendants Bio-Lab, Inc., KIK International, LLC, and KIK Custom Products, Inc. (collectively, the "Bio-Lab and KIK Defendants") file this Notice of Filing for their Proposed Case Management Order, which is attached as Exhibit A.

Dated: February 12, 2025

Respectfully submitted,

/s/ Michael A. Caplan

Michael A. Caplan (GA # 601039)  
Michael L. Eber (GA # 859338)  
Jessica Arnold Caleb (GA # 141507)  
Emily C. Snow (GA # 837411)  
**CAPLAN COBB LLC**  
75 Fourteenth Street NE, Suite 2700  
Atlanta GA 30309  
Tel. (404) 596-5600  
mcaplan@caplancobb.com  
meber@caplancobb.com  
jarnold@caplancobb.com  
esnow@caplancobb.com

/s/ Alan E. Schoenfeld

Alan E. Schoenfeld

/s/ Mirza Qader Ali Baig

Mirza Qader Ali Baig (GA # 031610)  
**M. QADER A. BAIG &  
ASSOCIATES, LLC**  
913 Commercial Street NE, Suite B  
Conyers GA 30012-4537  
Tel. (770) 929-1665  
mqab@mqablalaw.com

/s/ Shayna E. Sacks

Shayna E. Sacks  
(Admitted Pro Hac Vice)  
**NAPOLI SHKOLNIK PLLC**  
360 Lexington Avenue, Floor 11  
New York NY 10017-6502  
Tel. (212) 397-1000

*(Admitted Pro Hac Vice)*

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**

7 World Trade Center  
250 Greenwich Street  
New York NY 10007  
Tel. (212) 230-8800  
alan.schoenfeld@wilmerhale.com

Felicia H. Ellsworth

*(Admitted Pro Hac Vice)*

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**

60 State Street  
Boston MA 02109  
Tel. (617) 526-6000  
felicia.ellsworth@wilmerhale.com

*Counsel for Defendants*

ssacks@napolilaw.com

Hunter J. Shkolnik

*(Admitted Pro Hac Vice)*

Paul J. Napoli

*(Admitted Pro Hac Vice)*

Veronica N. Vazquez Santiago

*(Admitted Pro Hac Vice)*

**NS PR LAW SERVICES LLC**

1302 Avenida Ponce de León  
San Juan PR 00907-3982  
Tel. (833) 271-4502  
hunter@nsprlaw.com  
pnapoli@nsprlaw.com  
vvazquez@nsprlaw.com

*Counsel for Plaintiff*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, allowing the font type of Book Antiqua and point size of 13.

/s/ Shayna E. Sacks  
Shayna E. Sacks

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on February 12, 2025 via the Court's CM/ECF system.

/s/ Shayna E. Sacks  
Shayna E. Sacks